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HELICOPTER NOISE COALITION ~~OF~~ NEW YORK CITY

August 1, 2000

Jane Garvey, Administrator  
Federal Aviation Administration  
800 Independence Avenue SW  
Washington, DC 20591

Dear Ms. Garvey,

Thank you for extending the comment period for the FAA Helicopter Noise Study to 9/25/00.

I was surprised to learn from an FAA staff member today by telephone that: ① the NYC data collection phase of the study was completed 7/17/00, prior to the original 7/24/00 deadline for public comment making public input into study design impossible (i.e. no public scoping session), ② the data collection effort consisted solely of helicopter noise readings from Liberty Park, NJ and city heliports, ③ while some survey of the aircraft noise literature will be made, this study focuses on air traffic control procedures and not the effect of helicopter noise on people (the legislation expressly states "the effect of nonmilitary helicopter noise on individuals").

We believe that the intent of the legislation is being subverted by the narrow scope of the FAA inquiry.

- ① The legislation is not confined to individuals in densely populated areas of the continental US, yet the study is
- ② The legislation mandates a study on the effects of non-military helicopter noise on individuals yet the FAA NYC data collection effort is restricted to helicopter noise measures (which the FAA already has data on), omitting quantitative measures of helicopter noise impact <sup>on</sup> people,
- ③ The legislation mandates recommendations for the reduction of the aforesaid noise yet the FAA study primarily restricts itself to FAA air traffic control procedures

④ The major goal of the FAA study to determine the type of helicopter operations eliciting negative community response appears nowhere in the legislation - in our experience helicopters disturb individuals irrespective of mission - and is immaterial.

In our view a valid study must include:

- ① Surveys of individuals affected examining the impact helicopter noise has on their lives and health
- ② Interior helicopter noise measures in a variety of environments - homes, schools, hospitals, businesses
- ③ Exterior helicopter noise measures in a variety of environments - quiet side streets, urban parks, national monuments, heliports
- ④ A thorough review of the literature on aircraft noise impacts as well as <sup>germane</sup> material from the general noise literature
- ⑤ Consideration of appropriate legislative and regulatory remedies.
- ⑥ Account of helicopters in the community airspace.

We urge that the FAA study be modified to address our concerns. Any study failing to incorporate these issues will be deemed unreasonable and invalid in the eyes of our members. We will take all appropriate action to influence the design and conduct of this study so that it fulfills the mandate of the legislation as we understand it.

Sincerely,

Jay A. Held

Jay A. Held, President  
212/628-3126 tel/fax



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HELICOPTER NOISE COALITION @ NEW YORK CITY September 24, 2000

FAX to : New York Times FAX# 212/ 556 - 3622  
From: Joy Held 212/ 628-3126 tel + FAX

To the Editor :

Your article "Measuring That Whirring Sound Just Above" (City, Sept. 24, page 6) gets to the heart of the helicopter noise problem here. No amount of Federal Aviation Administration tinkering (fixed helicopter routes, minimum helicopter altitudes, more stringent noise certification for helicopters) or municipal regulation (the ongoing city and state ban for tour helicopters at New York City heliports on city or state property) will solve the problem as long as tour-news-commercial helicopters fly "carte blanche" in our airspace. New Yorkers will have no real protection until the city has control over its airspace or the FAA bans non-emergency helicopters from flying here. It is instructive to note that while the City Council labors to limit commercial noise impacts inside residences to 45 decibels (related story Sept. 24 "Council Is Asked to Act in War of Nerves vs. Commercial Noise"), helicopters currently inflict sixteen times that noise on hapless residents today (86 decibels of helicopter noise inside residences found in Helicopter Noise Coalition 1997 helicopter noise study, and 90 decibels of helicopter noise <sup>found</sup> in City study at apartment terraces on Roosevelt Island in 1998) and the city is powerless to act. Since the federal government preempts city authority over aircraft / heliport noise it is up to the federal government to protect us from this extreme airborne intrusion.

Sincerely,

Joy A. Held

Joy A. Held, President